

SCOTT N. SCHOOLS (SC 9990)
United States Attorney

MARK L. KROTOSKI (CASBN 138549)
Chief, Criminal Division

JEFFREY R. FINIGAN (CASBN 168285)
Assistant United States Attorney

450 Golden Gate Avenue
San Francisco, California 94102
Telephone: (415) 436-7232
Facsimile: (415) 436-7234
Email: jeffrey.finigan@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
MICHAEL EDISON,)
)
Defendant.)

Criminal No. CR 07-0074 WHA

**STIPULATION AND ~~[PROPOSED]~~
ORDER EXCLUDING TIME**

The above-captioned matter came before the Court on May 15, 2007, for status. The defendant was represented by John G. Hanlin, Esq., and the government was represented by Jeffrey Finigan, Assistant United States Attorney. The matter was continued to May 29, 2007, at 2:00 p.m. for identification of new counsel.

The Court made a finding that the time from and including May 15, 2007, through and including May 29, 2007, should be excluded under the Speedy Trial Act, 18 U.S.C.

§ 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best

STIPULATION AND ~~[PROPOSED]~~
ORDER EXCLUDING TIME
CR 07-0074 WHA

1 interest of the public and the defendant in a speedy trial. The finding was based on the need for
 2 the defendant to have reasonable time necessary for effective preparation, taking into account the
 3 exercise of due diligence, and for continuity of counsel pursuant to 18 U.S.C.

4 § 3161(h)(8)(B)(iv).

5 The parties hereby agree to and request that the case be continued until May 29, 2007,
 6 and that the exclusion of time until then be granted. The parties agree and stipulate that the
 7 additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A),
 8 because the ends of justice served by this continuance outweigh the best interest of the public and
 9 the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively
 10 prepare, taking into account the exercise of due diligence, and will provide for continuity of
 11 counsel for the defendant.

12
 13 DATED: May 16, 2007

/s/

 JOHN G. HANLIN
 Counsel for Michael Edison

14
 15
 16 DATED: May 16, 2007

/s/

 JEFFREY R. FINIGAN
 Assistant U.S. Attorney

17
 18
 19 So ordered.

20 DATED: May 17, 2007.



 WILLIAM H. ALSUP
 UNITED STATES DISTRICT COURT JUDGE